

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re: ) Chapter 9  
 )  
CITY OF DETROIT, MICHIGAN, ) Case No. 13-53846  
 )  
Debtor. ) Judge Thomas J. Tucker  
 )  
\_\_\_\_\_ )

**STIPULATION FOR THE ENTRY OF AN ORDER MODIFYING THIS  
COURT'S NOVEMBER 11, 2016 ORDER (DOCKET NUMBER 11672)**

The City of Detroit, Michigan (“City”), AFSCME Council 25 and Its Affiliated Detroit Locals (“AFSCME”) and the Coalition of Detroit Unions (“Coalition”) stipulate and agree as follows:

A. On February 21, 2014, AFSCME filed proof of claim 2958 (“AFSCME Claim”) which was comprised of 20 components. On that same date, the Coalition filed proof of claim 2851 (“Coalition Claim”).

B. On May 29, 2015, this Court entered its Order Regarding Further Proceedings on the City of Detroit’s Objections to Proof of Claim Number 2851 Filed by the Coalition of Detroit Unions and to the Proof of Claim Number 2958 Filed by Michigan AFSCME Council 25 and Its Affiliated Detroit Locals (Doc. No. 9900).

C. On July 19, 2015, this Court entered the Order Modifying the Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals. (Doc. No. 10071).

D. On September 30, 2015, this Court entered the Order Modifying Order Modifying the Court's May 29, 2015 Order Regarding Further Proceedings on the City of Detroit's Objections to Proof of Claim Number 2581 Filed by the Coalition of Detroit Unions, and to the Proof of Claim Number 2958 Filed by Michigan AFSCME Council 25 and its Affiliated Detroit Locals. (Doc. No. 10219).

E. On November 25, 2015, this Court entered the Order Modifying This Court's September 30, 2015 Order. (Doc. No. 10286).

F. On January 29, 2016, this Court entered the Order Modifying This Court's November 25, 2015 Order. (Doc. No. 10740).

G. On April 29, 2016, this Court entered the Order Modifying This Court's January 29, 2016 Order. (Doc. No. 11133).

H. On June 27, 2016, this Court entered the Order Modifying This Court's April 29, 2016 Order. (Doc. No. 11326).

I. On August 26, 2016, this Court entered the Order Modifying This Court's June 27, 2016 Order. (Doc. No. 11491).

J. On October 28, 2016, this Court entered the Order Modifying This Court's August 26, 2016 Order. (Doc. No. 11649).

K. On November 14, 2016, this Court entered the Order Modifying This Court's October 28, 2016 Order. (Doc. No. 11672) ("Order").

After the entry of the Order, the parties continued to finalize the component of the settlement regarding the resolution of proofs of claim filed by individual union members and other unions that the City asserts are duplicative of the claims asserted in the AFSCME Claim and the Coalition Claim. AFSCME and the Coalition have requested additional time to provide such claimants with notice of this resolution. As such, the parties request that the Court provide them with an additional twenty-one days to finalize and file the stipulation.

NOW, THEREFORE, the City, AFSCME and the Coalition stipulate and agree as follows:

1. The filing deadlines in paragraph 1 of the Order are extended from November 28, 2016 to December 19, 2016.

2. The filing deadlines in paragraph 2 of the Order are extended from January 24, 2017 to February 14, 2017.

3. The filing deadlines in paragraph 3 of the Order are extended from February 24, 2017 to March 17, 2017.

4. The filing deadlines in paragraph 4 of the Order are extended from December 6, 2016 to December 27, 2016.

SO STIPULATED:

/s/ Richard G. Mack  
Richard G. Mack, Jr.  
Adam Graham  
MILLER COHEN PLC  
600 West Lafayette Boulevard  
4th Floor  
Detroit, MI 48226  
Telephone: (313) 566-4787  
Facsimile: (313) 964-4490  
richardmack@millercohen.com

/s/ Marc N. Swanson  
John H. Willems (P31861)  
Jonathan S. Green (P33140)  
Marc N. Swanson (P71149)  
MILLER, CANFIELD, PADDOCK  
AND STONE, P.L.C.  
150 West Jefferson  
Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 963-6420  
Facsimile: (313) 496-7500  
swansonm@millercanfield.com

ATTORNEYS FOR AFSCME AND  
THE COALITION

ATTORNEYS FOR THE CITY

DATED: November 25, 2016

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re: ) Chapter 9  
 )  
CITY OF DETROIT, MICHIGAN, ) Case No. 13-53846  
 )  
Debtor. ) Judge Thomas J. Tucker  
 )  
\_\_\_\_\_ )

**ORDER MODIFYING THIS COURT'S NOVEMBER 11, 2016 ORDER  
(DOCKET NUMBER 11672)**

This case is before the Court on the stipulation filed on November 25, 2016 entitled “Stipulation for the Entry of an Order Modifying this Court’s November 11, 2016 Order (Docket Number 11672)” (Docket # [ ], the “Stipulation”). Based on the Stipulation,

IT IS ORDERED THAT the Court’s November 11, 2016 Order at docket # 11672 entitled “Order Modifying This Court’s October 28, 2016 Order (Docket Number 11649)” (the “Order”) is modified as follows:

1. The filing deadlines in paragraph 1 of the Order are extended from November 28, 2016 to December 19, 2016.
2. The filing deadlines in paragraph 2 of the Order are extended from January 24, 2017 to February 14, 2017.

3. The filing deadlines in paragraph 3 of the Order are extended from February 24, 2017 to March 17, 2017.

4. The filing deadlines in paragraph 4 of the Order are extended from December 6, 2016 to December 27, 2016.